



Prudential

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US Bankruptcy Court
Southern District of Mississippi
RECEIVED

JUL 21 2025

Danny L. Miller, Clerk of Court
By: _____, Deputy Clerk

Insured: Tommie E. Walton
Policy Number: L9095237

US Bankruptcy Clerk
US Bankruptcy Court
Thad Cockran United States Courthouse
501 E Court St Ste 2300
Jackson, MS 39201

July 9, 2025

Dear US Bankruptcy Clerk:

I am writing in response to the *Notice of Bankruptcy* we received in regard to Tommie Earl Walton, the debtor listed above.

Prudential does not possess any property owned by this debtor. Therefore, we have no assets to turn over to you.

If you have any questions or would like more information, please call our customer service office at (800) 778-2255 and refer to reference number SPC13680375. We are available Monday through Friday between 8:00 a.m. and 8:00 p.m. Eastern time. If you are using a telecommunications device for the hearing impaired, please call (800) 778-2255, Monday through Friday between 8:00 a.m. and 8:00 p.m. Eastern time. One of our customer service representatives will be glad to help you.

Your Customer Service Team

cc: Thomas C. Rollins Jr

06/30/25 10:41:32 Via Fax

-> Prudential

Faxout Process

Page 001

VIA FAX

TO: BANKRUPTCY

FROM: d165600

ATTN:

TO: FAX PHONE#: 866-597-4082

Job Number: 1607235467-012-1-0000

TIME: Mon 30 Jun 2025 10:41:28 AM EDT

8 pages including cover sheet

00000158 00773 0003-0010 DIC053CD070925748198 00 L 00000224

7332359900 - 23 | 42
THOMAS C. ROLLINS, JR.
THE ROLLINS LAW FIRM
702 W PINE STREET
HATTIESBURG, MS 39401



7332359900_26

PRUDENTIAL
PO BOX 7390
PHILADELPHIA PA 19176-7390

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7332359900-25-01339-JAW-TAMMY MARIE WALTON

PLEASE TAKE NOTICE: THE FOLLOWING DOCUMENTS BEGIN IMMEDIATELY AFTER THIS PAGE:

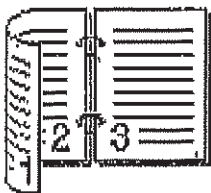
Notice and Applcation for Compensation

Exhibit A Invoice

Exhibit C Affidavit

HOW TO READ THIS DOCUMENT:

Orient your document package per the chart below



ONE PAGE PER SIDE



TWO PAGES PER SIDE

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Tommy Mario Walton
Tommy Earl Walton, Debtors

Case No. 25-01339-JAW
CHAPTER 13

NOTICE

The undersigned counsel for Debtors have filed papers with the court to approve attorney's compensation.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the Application, or if you want the court to consider your views on the Application, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing on:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Thad Cochran United States Courthouse
501 E. Court St., Ste 2300
Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also mail a copy to the Debtors' attorney.

The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39216
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Application and may enter an order granting that relief, which shall sustain this Application for Compensation.

Date June 26, 2025

Signature: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103449)
Jennifer A. Curry Calvello (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39216
601-500-5533
tcrollins@therollinsfirm.com

RETAINER

- The Debtors haven't paid a \$1,500.00 advance payment retainer which should be applied to fees awarded pursuant to this application.

FEE REQUESTED

- The time incurred and services provided by the firm during the pendency of this case has resulted in Attorney's fees in the amount of \$2,494.00 and expenses in the amount of \$310.24 for a total of \$2,804.24. A detailed accounting is attached hereto as Exhibit "A".
- This is the Applicant's first request for allowance of compensation for professional services rendered in this proceeding. This request covers the period from April 7, 2025 to June 19, 2025.

A LODestar ANALYSIS

- The prevailing hourly rate in the community under § 330

The Applicant requests fees based on the following hourly rates, \$360.00 for attorneys, \$155.00 for paralegals, and \$100.00 for legal assistants.

The hourly rates for attorneys with similar skills and experience as consumer bankruptcy attorneys can vary widely, typically ranging from \$200 to \$450 per hour. Due to the specialized nature of bankruptcy law, many attorneys are not proficient in this field. However, with 14 years of experience, approximately 4,000 bankruptcy cases filed, board certification in consumer bankruptcy law, and a strong community reputation, Thomas Rollins is well-qualified to command fees at the higher end of this range. Similarly, Jennifer Calvello, who has 12 years of experience with the same firm, having worked on 90% of those 4,000 cases, holds board

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Tommy Mario Walton
Tommy Earl Walton, Debtors

Case No. 25-01339-JAW
CHAPTER 13

**FIRST APPLICATION FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF NECESSARY EXPENSES
FOR THOMAS C. ROLLINS, JR.**

COMES NOW, Thomas C. Rollins, Jr., (the "Applicant") attorney for the Debtors, and

files this First Application for Allowance of Compensation and Reimbursement of Necessary

Expenses for Thomas C. Rollins, Jr. and in support thereof, would respectfully show to this

Honorable Court as follows, to-wit:

- On May 30, 2025, Debtors filed a bankruptcy petition under Chapter 13 of the bankruptcy code.

FEE AGREEMENT

- The Debtors and Thomas C. Rollins, Jr. of The Rollins Law Firm, PLLC (hereinafter "the firm"), have agreed to an hourly billing arrangement in lieu of this Court's standard "no look" fee award. For said agreement, attorney T.C. Rollins is billed at a rate of \$360.00 per hour while attorney Jennifer Calvello is billed at a rate of \$360.00 per hour. Paralegals are billed at a rate of \$155.00 per hour. Legal Assistants bill at \$100.00 per hour. Said rates are reasonable and in keeping with community custom and standards for attorneys in this area.
- Throughout its representation of the Debtors herein, Applicant has maintained itemized billing entries which are completed and maintained contemporaneously with the associated service(s) provided.

certification as consumer bankruptcy law, is highly regarded in the community, and is a partner in her firm, is equally positioned to charge at the upper end of this spectrum. The Applicant's paraprofessionals charge a blended rate of \$127.50 per hour, which is within this reasonable range for paraprofessional services.

2. Reasonable hours expended

While Chapter 11 lawyers may only be compensated for reasonable time expended that produce a material benefit to the estate, § 330(c)(3) provides that a chapter 13 debtor's attorney can be awarded reasonable compensation for representing the interests of the debtor based on the benefit and necessity of such services to the debtor and the other factors found in § 330.

The services provided to the Debtor and the expenses incurred by the Applicant were essential for administering the bankruptcy case, safeguarding the Debtor's rights, and fulfilling the Applicant's obligations under the Bankruptcy Code.

An itemization of time is attached as Exhibit "A" and an affidavit of Applicant is attached as Exhibit "C".

3. Lodestar calculation

The lodestar amount for the Applicant's attorneys is \$1,210.00, reflecting 4.4 hours at an hourly rate of \$275.00.

For the Applicant's paraprofessionals, the lodestar amount is \$1,284.00, based on 10.8 hours at a blended rate of \$118.89 per hour.

Together, the total lodestar amount is \$2,494.00, representing a combined total of 15.2 hours at a blended rate of \$163.89 per hour.

II. ADJUSTMENTS TO LODestar

After determining the appropriate lodestar amount, the Court must decide whether the application of the § 330 factors and the Johnson factors warrant upward or downward adjustment.

1. § 330 Factors

The following § 330 factors were already discussed when determining the lodestar amount:

- (A) The time spent on such services;
- (B) The rates charged for such services;
- (C) Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

The remaining § 330 factors are discussed below:

- (D) Whether the services were necessary to the administration of, or beneficial to the estate at which the service was rendered toward the completion of a case under this title,
 - a. The services provided to the Debtor and the expenses incurred by the Applicant were essential for administering the bankruptcy case, safeguarding the Debtor's rights, and fulfilling the Applicant's obligations under the Bankruptcy Code.
 - b. No adjustment is warranted.
- (E) Whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue or task addressed,
 - a. The Applicant did not devote excessive time to drafting schedules, pleadings, or conducting research. A significant amount of time was spent investigating the Debtor's financial situation and gathering the necessary documents for submission to the Trustee. This work was efficiently handled by legal assistants, who billed at \$100.00 per hour.
 - b. No adjustment is warranted.

- a. This factor was already discussed in the § 330 analysis. (Whether the services were necessary to the administration of, or beneficial to the estate at which the service was rendered toward the completion of a case under this title.)
 - b. No adjustment is warranted.
10. The understandability of the case
- a. While this case is no less desirable than other Chapter 13 cases, when compared to the broader legal community Chapter 13 cases have many elements that make them very understandable.
 - b. Client Non-Cooperation: Debtors in Chapter 13 cases may have difficulty gathering the necessary financial documentation or adhering to the repayment plan, which increases the Attorney's workload and the chances of case dismissal.
 - c. Length of the Process: Chapter 13 cases typically last 5 years, which may lead to diminished client interest and requires attorneys to remain vigilant for potential issues throughout the repayment period. Few practices accept demand such a long term commitment, where a lawyer must predict an appropriate fee upfront. While some bankruptcy cases are confirmed and proceed smoothly, most require substantial additional work, post confirmation, including handling Motions to Dismiss or Motions for Relief.
 - d. Risk of Dismissal: If the debtor fails to make payments or meet other requirements of the repayment plan, the case may be dismissed, and the Attorney may not be compensated for all of the work completed. Chapter 13 practitioners collect a shockingly low percentage of allowed fees in chapter 13 cases.
 - e. This factor weighs in favor of an upward adjustment.

11. The nature and length of the professional relationship with the client

- a. Applicant had no prior professional relationship with the client prior to their engagement in this matter.
- b. No adjustment is warranted.

12. Awards in similar cases

- a. The "market rate" of \$4,000.00 is a distorted figure, as attorneys are pressured to accept it to avoid the burdensome fee application process, rather than reflecting a true market rate.
- b. Under § 330(b)(2)(F), the Court is instructed to compensate bankruptcy attorneys at a rate comparable to that of similarly skilled and experienced non-bankruptcy attorneys.
- c. This is only one of the twelve Johnson factors. If the Court determines that a downward adjustment is warranted, this factor should be considered alongside the other § 330 and Johnson factors which favor an upward adjustment of the lodestar.

(F) With respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field, and

- a. Both Thomas Rollins and Jennifer Colville are board-certified in consumer bankruptcy law by the American Board of Certification. In Mississippi, only five bankruptcy practitioners hold this certification, with three based in the state of Mississippi, two are with the Applicant's firm.
- b. The Applicant's extensive experience has already been addressed in the lodestar analysis.
- c. This factor was taken into account when setting the Applicant's hourly rate, but otherwise supports an upward adjustment.

2. Johnson Factors

The following Johnson factors were already discussed when determining the lodestar amount:

- 1. The time and labor required;
- 2. The novelty and difficulty of the questions presented;
- 3. The skill required to perform the legal services properly;
- 4. The customary fee in the community;
- 5. Whether the fee is fixed or contingent;
- 6. The experience, reputation, and ability of the attorneys.

The remaining Johnson factors are discussed below:

- 7. The prohibition of other employment by the attorney due to acceptance of the case
 - a. Not Applicable.
 - b. No adjustment is warranted.
- 8. Time limitations imposed by the client or circumstances
 - a. Not Applicable.
 - b. No adjustment is warranted.
- 9. The amount involved and the results obtained.

- d. Market rates have been addressed in the lodestar analysis, and no additional adjustment is necessary.

WHEREFORE, PREMISES CONSIDERED, Applicant requests that the Court enter an Order awarding reasonable attorneys' fees for the professional services rendered herein and authorizing and directing Debtors to pay said attorneys' fees and expenses. Applicants pray for general relief.

Respectfully submitted,

/s/ Thomas C. Rollins, Jr.
 Thomas C. Rollins, Jr. (MSBA 103469)
 The Rollins Law Firm, PLLC
 P.O. Box 13767
 Jackson, MS 39226
 601-300-3333

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Application for Compensation was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.
 Thomas C. Rollins, Jr.

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[illegible]

File # 4015 - 00142623

Thina Koober	Position	Quantity	Rate	Total
John Per Curry O'Grady	Attorney	3.6	\$275.00	\$990.00
Thomas Ruzina	Attorney	0.6	\$275.00	\$165.00
Dianna Bivensland	Non Attorney	3.1	\$100.00	\$310.00
David Quiry	Non Attorney	9.8	\$188.00	\$1842.40
Veronica Mangan	Non Attorney	4.1	\$100.00	\$410.00
Elizabeth Daniel	Non Attorney	3.2	\$185.00	\$592.00
Glenn Griggs	Non Attorney	1.2	\$100.00	\$120.00
Glenn Griggs	Non Attorney	0.6	\$0.00	\$0.00
Karen Radaough	Non Attorney	0.0	\$125.00	\$125.00
			Subtotal	\$3,694.40
			Total	\$3,694.40

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6018	07/15/2008	\$2,994.24	\$0.00	\$2,994.24
			Outstanding Balance	\$2,994.24
			Total Amount Outstanding	\$2,994.24

\$0.18	<u>\$7,996.96</u>	<u>\$3,998.48</u>	<u>\$0.00</u>	<u>\$7,998.48</u>
				Outstanding Receipts
				<u>\$3,998.48</u>
				Total Amount Outstanding
				<u>\$3,998.48</u>

159 00778 0008-0010 DIC053CD070925748198 00 L 00000224

Code File Name

[illegible]

By clicking on the "Get Estimate" button below, you (hereafter "User") agree to the following terms and conditions. This quote is for estimation purposes and is not a contract. It is provided as a service to current or potential customers. The information is intended to assist in making purchasing decisions. It does not constitute a review by our Estimating Services. All the pricing on the actual cost of building a particular project, many factors may or may not be known at the time of obtaining the estimate. Changes in availability, changes in documents, international fuel costs and other factors all influence the

Estimate will be submitted below

Price Rate Charge Includes: (1) the preparation and printing of the documents for mailing; (2) the preparation and printing of the return envelopes for the mailings; (3) the folding and insertion of the documents into the envelopes; (4) the mailing of the envelopes; (5) the storage of the processed mail claim package on file until ready; (6) first sending the envelopes for delivery to the U.S. Mail via Bulkmail Entry Unit; and (7) the preparation and electronic delivery of our copy of service document for filing on PowerCase.

Date and Time	Thu Apr 19 2018 19:01:18 GMT-0300 (Central Daylight Time)
Total Pages to Print	110
Sheets Per Envelope	20
Print Queue Pages per Minute	6.670
Print Rate	6.619
Printing Cost	\$
Postage Cost	\$7.83
Total Cost	\$0.33

PM: The Center

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<https://doi.org/10.1016/j.jmb.2019.05.004>

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Tammy Marie Walton
Tommie Earl Walton, Debtors

Case No. 25-01339-JAW
CHAPTER 13

AFFIDAVIT

I, Thomas C. Rollins, Jr., being first duly sworn, depose and state as follows:

1. I am an attorney licensed to practice law in the State of Mississippi and am one of the attorneys representing the debtor in the Chapter 13 case referenced in the attached Application.
2. I have personal knowledge of the matters stated herein and am competent to testify to them.
3. Attached to the Application as Exhibit "A" and/or "B" is a detailed statement of fees and expenses incurred in connection with my representation of the debtor in this matter.
4. I hereby swear and affirm that the statements, fees, and expenses listed in Exhibit "A" and/or "B" are true, accurate, and represent a reasonable accounting of the work performed, as well as any costs incurred on behalf of the debtor.
5. The fees and expenses detailed in Exhibit "A" and/or "B" are in accordance with customary rates for similar services and are fair, reasonable, and necessary under the circumstances of this Chapter 13 case.

FURTHER, AFFIANT SAYS: TRUE NAUGHT.

TCR
Thomas C. Rollins, Jr.

SUBSCRIBED AND SWORN TO BEFORE ME, this 23rd day of June, 2026, by

Thomas C. Rollins, Jr.

Vanessa Martinez
Notary Public

My Commission Expires _____

Exhibit "C"

